

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

JEFF BANKER and SAMMYE
BANKER,

Plaintiffs,

v.

FIFTY PLUS RACING
FOUNDATION, INC., OLTHOFF
RACING, INC., DENNIS OLTHOFF,
JOHN DOE and JOHN DOE
CORPORATION

Defendants.

Civil Action File No.
1:20-CV-00228-DCLC-CHS

PLAINTIFFS' SECOND IDENTIFICATION OF EXPERT

COME NOW Jeff Banker and Sammye Banker and identifies the following expert pursuant to F.R.C.P. 26(a)(2)(C). Plaintiffs are providing a summary of the expected testimony of the expert.

Dr. Michael Schaufele has reviewed medical records of Jeff Banker and conducted an independent medical examination of him. Dr. Schaufele will testify concerning Mr. Banker's past treatment and care and that the need for this care is related to the incident on October 11, 2019. Dr. Schaufele will testify concerning Mr. Banker's future prognosis and his need for future treatment and care and that the needs for future treatment and care are related to the incident on October 11,

2019. Dr. Schaufele is assisting in the formation of a life care plan for Mr. Banker and will testify that the items contained in the life care plan are reasonable and medically necessary for the future treatment and care of Mr. Banker and that the need for the items contained in the life care plan are related to the incident on October 11, 2019. Dr. Schaufele will also testify concerning the future risks associated with Mr. Banker's injuries and that these future risks are related to the incident on October 11, 2019. Dr. Schaufele may have additional opinions that are included in his report that has been produced to Defendants.

This 20th day of January, 2021.

Respectfully Submitted,

FRIED GOLDBERG LLC

/s/ Michael L. Goldberg

MICHAEL L. GOLDBERG

Tennessee BPR No.: 035863

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *PLAINTIFFS' SECOND IDENTIFICATION OF EXPERT* with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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Dated on January 20, 2021.

FRIED GOLDBERG LLC

/s/ Michael L. Goldberg
MICHAEL L. GOLDBERG
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